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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda Du

**STIPULATION TO RELEASE DEFENDANT
DAVID B. KAPLAN'S PASSPORTS AFTER
ENTRY OF FINAL JUDGMENTS AND
TRANSFER OF FROZEN ASSETS**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as follows:

1 1. On May 20, 2016, the Court granted the Motion for Temporary Restraining Order by
2 Plaintiff United States Securities and Exchange Commission and ordered Defendant David B.
3 Kaplan to surrender his passports (USA and St. Kitts/Nevis) to the Clerk of the Court. (ECF No. 14
4 § VII.)

5 2. On May 27, 2016, the Clerk of the Court received Defendant's 2 passports and
6 secured them in the Court's vault. (ECF No. 18.)

7 3. On June 9, 2016, the Court entered an Agreed Order of Preliminary Injunction,
8 directing the Clerk of the Court to retain Defendant's passports until the conclusion of this
9 litigation. (ECF No. 23 § V.)

10 4. On January 8, 2018, the parties filed Stipulations for Entry of Final Judgments,
11 which asked this Court to enter final judgments against Defendants and Relief Defendants pursuant
12 to settlement agreements among the parties. (ECF Nos. 95-98.)

13 5. On January 8, 2018, the Court entered Final Judgments against Defendants and
14 Relief Defendants. (ECF Nos. 103-106.) The Final Judgments directed various financial
15 institutions to transfer the entire balance of certain frozen accounts to the SEC within three days
16 after being served with a copy of the Final Judgments.

17 6. As of January 31, 2018, all identified financial institutions had transferred the frozen
18 funds to the SEC.

19 7. The Final Judgments having been entered and the SEC having received the frozen
20 funds, the parties now respectfully request that the Clerk of the Court be directed to return the
21 aforementioned passports to Defendant David B. Kaplan.

22 Date: January 31, 2018

23 /s/ Alyssa A. Qualls
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/s/ David B. Kaplan
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IT IS SO ORDERED: Clerk of Court
aforementioned

Clerk of the Court be directed to return the
aforementioned passports to Defendant David B. Kaplan.

The Honorable Miranda Du
United States District Judge

Dated: January 31, 2018